

**IN THE CIRCUIT COURT OF RIPLEY COUNTY, MISSOURI**

IN RE THE MARRIAGE OF:	)	
CHARLES M. HAYNES and	)	
CYNTHIA K. HAYNES	)	
	)	
CHARLES M. HAYNES,	)	
Petitioner,	)	
	)	
vs.	)	Case No. 13RI-CV00554
	)	
CYNTHIA K. HAYNES,	)	
Respondent	)	
	)	
vs.	)	
	)	
BERNICE HAYNES,	)	
Intervenor.	)	

**MOTION TO COMPEL AND FOR PROTECTIVE ORDER**

COMES NOW Allyson E. Brown, appointed by this Court, pursuant to R.S.Mo. §452.423, to serve as Guardian Ad Litem for the parties' minor child, S.H, and hereby moves this Court to compel Jennifer Williams to produce and disclose a copy the records, reports, documents, and/or tangible material from William's files that relates to the Parties' minor children, the Divorce Case, and Juvenile Cases maintained by Jennifer Williams, and in support of that motion states as follows:

1. Jennifer Williams ("Williams") was appointed by this Court, pursuant to R.S.Mo. § 452.423, to serve as Guardian Ad Litem in the Divorce Case to represent the interests of the Parties' minor children, (S.H., and M.H., deceased).
2. Williams also served as Guardian ad Litem for the minor children in two Juvenile Court proceedings, to wit: 17RI-JU00011 and 17RI-JU00012 (collectively "Juvenile Cases")

3. In her service as Guardian Ad Litem, Jennifer Williams maintained files that include records, reports, documents, and/or tangible material that relates to the Parties' minor children, the Divorce Case, and Juvenile Cases

4. On or about April 29, 2021, Williams withdrew as Guardian ad Litem in the Divorce Case.

5. On or about December 10, 2021, Allyson Brown ("Brown"), was appointed by this Court to serve as Guardian Ad Litem and to represent the interests of the Parties' minor child, S.H.

6. The records, reports, documents, and/or tangible material from William's files that relate to the Parties' minor children, the Divorce Case, and Juvenile Cases, must be produced to Brown so that Brown has the information necessary to carry out her duties and responsibilities in the Divorce Case;

7. According to the Missouri Standards for Guardian Ad Litem, the child is not the owner of said file and guardian ad litem should not provide the file to anyone, including the child, without consent of the court and only the court has authority to rule on any request concerning the handling of the file or order its release. (Standard 7.0)

8. According to the Missouri Standards for Guardian Ad Litem, the guardian ad litem is entitled to all reports relevant to the case and shall have access to all relevant records relating to the child, the placement of the child, or the child's family members. (Standard 6.0)

9. The file contains confidential and privileged information which, even if used during trial, should be protected from disclosure outside of this case.

WHEREFORE, Allyson E. Brown, acting as Guardian Ad Litem, prays this court to enter an order to compel the production of Sara Haynes's GAL file within 10 days subject to the proposed protection order.

Respectfully submitted,

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By /s/ Allyson E. Brown  
Allyson E. Brown, #71807